

NATIONAL TRANSPORT STRATEGY

Transform Scotland response to Draft Strategy for Consultation

23 October 2019

1. Priorities for Scotland's National Transport Strategy.

We are very happy to support the 'six priorities' set out by ourselves and seven other Scottish NGOs (Cycling Scotland, Cycling UK, Forth Environment Link, Living Streets, Paths for All, Ramblers Scotland & Sustrans Scotland). These are summarised below, but set out in full online.¹

- Give more space to walking and segregated cycling.
- End new road building and prioritise active and sustainable travel.
- Deliver affordable and integrated public transport.
- Planning for better land use.
- Support behaviour change.
- Improve access to bikes.

2. Transport costs and prices, and Demand management.

We welcome the recognition that demand management must play a central role in the Scottish Government's transport policy:

"We have ambitious statutory targets to tackle the global climate emergency ... But [new technologies] will not be enough – we will not be building infrastructure to support forecast demand – we will reduce the need to travel by unsustainable modes in line with the Sustainable Travel Hierarchy." (p9)

"Not taking steps to effectively manage demand for car use is no longer an option. We need to consider alternatives that encourage single occupancy drivers to shift, whenever possible, from making their journeys by car." (p40)

We are also pleased that the SNP, with the support of the Scottish Greens, has now put in place discretionary powers for Local Authorities to implement Workplace Parking Levy schemes:

"...provide legislation for the Work Place Parking Levy ... as part of the Transport Bill" (p60)

However, despite stating that not taking action on demand management is "no longer an option", the draft Strategy fails to offer any concrete action on demand management, offering only the pathetic concession of a "conversation" on the matter.

"[We will] start a conversation on other approaches to managing demand in Scotland as part of the Big Climate Conversation" (p60)

This is a matter which has been under active consideration by Scottish administrations for over 20 years,² yet we still face prevarication from Scottish Ministers on this matter. This inaction is not acceptable in the context of the Climate Emergency.

The recent Parliamentary debates over the Workplace Parking Levy proposals in the Transport Bill demonstrated the grossly uninformed, and often deliberately misleading, nature of debate about the price

of transport and its external costs. The Scottish Ministers failed to coherently argue the case on this matter, instead relying on the excuse that the WPL powers are a matter for the Local Authorities to promote.

We will repeat here the policy proposal submitted through our position on the Greener and Healthier Working Group, but then ignored by Transport Scotland in the preparation of this draft Strategy:

“Scottish Ministers should instruct Transport Scotland to work in conjunction with the relevant Local Authorities and Regional Transport Partnerships to develop road traffic demand management options for Scotland’s four major cities (e.g. Workplace Parking Levies, sharing lanes, road pricing) with funds raised to be reinvested in local transport improvements. This would not only reduce transport externalities, but would improve public health and quality of life in our cities, provide economic benefits, help contribute to national climate targets, and raise revenue for infrastructure improvements.”

As such, **we recommend that a programme of assistance to Local Authorities in delivering road traffic management measures be added to the NTS2 Delivery Plan.**

In order to make the case for the use of economic instruments (e.g. WPL) as demand management measures, the Scottish Ministers will, amongst other things, need to articulate the external costs of transport so that transport pricing decisions can be taken on the basis of ‘polluter pays’ and the true costs to society.

This is an ample and long-standing academic literature on this matter — which generally shows that the price paid by road transport covers only a proportion of its external costs — but there has been no recent Scottish evidence prepared to monitor these costs and determine whether they are being adequately covered by charges to users. These costs are not theoretical — they are paid by everyone in Scotland, whether they travel or not. But if they are not included in the cost of transport it means transport users are not making their decisions based on accurate information.

The current level of public debate on this matter is woeful and depressing. This was clearly manifest in the Stage 3 Scottish Parliamentary debate on the WPL powers in the Transport Bill earlier this month: this clearly demonstrated the stupidity, deceit and wilful ignorance of the opponents of demand management, and their supporters in the mainstream media. Even if the Government is not itself willing to take leadership in the area of demand management, it would be of great assistance to those Local Authorities who have shown a willingness to do so.³

As such, **we recommend that a programme of research to calculate and disseminate information about the full external costs and prices of transport be added to the NTS2 Delivery Plan. We would be happy to assist Transport Scotland in specifying such research and/or carrying out this research on behalf of the Scottish Ministers.**

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- ¹ Sustrans Scotland ‘Walking and cycling charities call for an end to road building’. Available at <<https://www.sustrans.org.uk/our-blog/news/2019/october/walking-and-cycling-charities-call-for-an-end-to-road-building/>>.
 - ² The 1997 Scottish Office white paper ‘Travel Choices for Scotland’ set out a fairly detailed discussion of proposals for local road user charging, trunk road user charging and the workplace parking levy, as well as consideration of transport prices and external costs. This material is completely absent from the 2019 draft strategy. See <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/263539/4010.pdf>.
 - ³ For example, those Local Authorities who have expressed an interest in implementing WPL schemes: The City of Edinburgh Council and Glasgow City Council.

Scotland’s alliance for sustainable transport

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We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).